



Exhibit

A

IN THE 22ND JUDICIAL CIRCUIT COURT OF CITY OF ST LOUIS, MISSOURI

Judge or Division: STEVEN RUSSELL OHMER	Case Number: 1122-CC00780
Plaintiff/Petitioner: RAYMOND TETRAULT	Plaintiff's/Petitioner's Attorney/Address JOHN WENDLER 119 PLEASANT RIDGE EDWARDSVILLE, IL 62025
Defendant/Respondent: UNITED PARCEL SERVICE CO	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Other Tort	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: UNITED PARCEL SERVICE CO

Alias:

CSC LAWYERS INCORPORATING
SERVICE COMPANY
221 BOLIVAR
JEFFERSON CITY, MO 65101

COLE COUNTY

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

March 9, 2011

Date

M. Jane Schweitzer
Circuit Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with
a person of the Defendant's/Respondent's family over the age of 15 years.
☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

(name) (title).

☐ other

Served at (address)

in (County/City of St. Louis), MO, on (date) at (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on (date).

My commission expires:

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$
Non Est \$
Mileage \$ (miles @ \$ per mile)
Total \$

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

IN THE CIRCUIT COURT
TWENTY-SECOND JUDICIAL CIRCUIT
ST. LOUIS CITY, MISSOURI

RAYMOND TETRAULT,

PLAINTIFF,

And

TIMOTHY MUELLER

PLAINTIFF,

And

RICHARD DOYLE

PLAINTIFF,

And

DELBERT CLICK

PLAINTIFF,

VS.

UNITED PARCEL SERVICE CO.

DEFENDANT,

SERVE:

CSC-LAWYERS INCORPPORATING

SERVICE COMPANY

221 Bolivar

Jefferson City, Missouri 65101

1122-CC 00780

PLAINTIFF'S RAYMOND TETRAULT, TIMOTHY MUELLER, RICHARD DOYLE AND
DELBERT CLICK
PETITION FOR DAMAGES – WRONGFUL DISCHARGE

COMES NOW, Plaintiffs' Raymond Tetrault, Tim Mueller, Richard Doyle and Delbert Click, by their attorney, John D. Wendler, and for their Petition for Damages directed to all Defendants states as follows:

COMMON ALLEGATIONS

1. At all times mentioned herein, Defendant, United Parcel Services, Co., was a domestic corporation authorized to do business in the State of Missouri, and had its principle place of business in the State of Missouri.
2. At all times mentioned herein, Plaintiff's Raymond Tetrault, Tim Mueller, Richard Doyle and Delbert Click, were residents of the State of Missouri, and were hired by United Parcel Services, Co., (herein after referred to as "UPS, Co."), in the State of Missouri.
3. Prior to January 1, 2011, Plaintiff's Raymond Tetrault, Tim Mueller, Richard Doyle and Delbert Click, began their employment with UPS, Co., being hired to drive various motor vehicles to deliver packages.
4. During the course of their employment with Defendant, UPS, Co., Plaintiff's Raymond Tetrault, Tim Mueller, Richard Doyle and Delbert Click, were subjected to the following treatment and/or forced to work in the following environment at UPS, Co.'s, facility:
 - i) They were cursed at and physically threatened by supervision.
 - ii) Employees were subjected to harassment with regard to race, age, color and sex.
 - iii) They were subjected to age discrimination in unequal supervision.
 - iv) They were fired for the sole reason of their compensation.
 - v) There was unequal discipline and consequence due to racial attitudes.
5. Despite complaints of the conduct set forth in the prior paragraphs to the Union and Human Resources Department of UPS, Co., no steps were taken to remedy the situation, and the conduct of local Missouri supervisor was ratified by the Corporation.
6. Written and verbal reports of discriminatory treatment, of violations of the law, and the physical impact to Plaintiff's Raymond Tetrault, Tim Mueller, Richard Doyle and Delbert Click were made to UPS, Co., but UPS, Co., failed to provide any assistance to Plaintiffs', or in any way

take any steps to remedy the racism, sexism and gender discrimination, to offer medical treatment and/or insist that unequal discipline be stopped.

7. As a direct and proximate result of the conduct by UPS, Co., the Plaintiffs' health was impacted and they sustained financial loss of their job and benefits.

8. Upon Plaintiffs' asking that the work place discrimination with regard to sex, race, unequal discipline and age be stopped, they were terminated from their employment.

9. As a direct and proximate result of the Defendant, UPS, Co., wrongfully discharging Plaintiffs' they sustained damages as follows:

- i) They sustained a loss of income excess of \$100,000 per year.
- ii) They lost medical insurance, pension benefits and other fringe benefits.
- iii) Has been forced to explain their termination in search for new employment.
- iv) They have been forced to miss loan payments and their credit has been damaged.

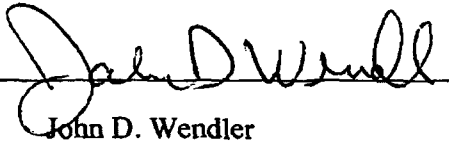
10. Plaintiff's are entitled to compensatory damages to be made whole regarding the elements of damages set forth above in paragraph 9.

11. Plaintiff's are entitled to punitive damages in an amount of money sufficient to deter the Defendant from like conduct in the future.

12. At all times mentioned herein, the Plaintiffs' performed their job related tasks as instructed an in a manner consistent with their pay and employment assignment.

WHEREFORE, Plaintiff's Raymond Tetrault, Tim Mueller, Richard Doyle and Delbert Click, pray judgment of this Court in their favor and against the Defendant, UPS, Co., in an amount of compensatory damages sufficient to compensate them for their losses and an award of punitive damages sufficient to deter like conduct in the future together with all costs and expenses.

LAW OFFICES OF JOHN D. WENDLER

By: 

John D. Wendler

P.O. Box 339

Edwardsville, Illinois 62025

(618) 288-9210

Fax (618) 288-9211

Mo. Bar No. 32854

Ill. Bar No. 2982043

ATTORNEY FOR PLAINTIFF'S RAYMOND
TETRAULT, TIM MUELLER, RICHARD DOYLE
AND DELBERT CLICK

IN THE CIRCUIT COURT
TWENTY-SECOND JUDICIAL CIRCUIT
ST. LOUIS CITY, MISSOURI

22ND JUDICIAL CIRCUIT
CIRCUIT CLERK'S OFFICE
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PURCHASING

ENTERED

MAR 16 2011

DRH

RAYMOND TETRAULT,

PLAINTIFF,

And

TIMOTHY MUELLER

PLAINTIFF,

And

RICHARD DOYLE

PLAINTIFF,

And

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PLAINTIFF,

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UNITED PARCEL SERVICE CO.

DEFENDANT,

SERVE:

CSC-LAWYERS INCORPPORATING

SERVICE COMPANY

221 Bolivar

Jefferson City, Missouri 65101

1122-CC00780

NOTICE OF DISMISSAL - NO REPRESENTATION

COMES NOW, John D. Wendler, Attorney at Law, and dismisses Delbert Click as a party to the above action, as he is not represented by John D. Wendler.

LAW OFFICES OF JOHN D. WENDLER

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ATTORNEY FOR PLAINTIFF'S RAYMOND
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